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about one half of one percent of the queries (.549). *See* Confidential Exhibit DP-10. The CLEC concern about the completeness of facility information in Qwest's RLDT does not seem to be an issue at all in light of these findings. It is also important to note that this database is the exact database which Qwest uses for its own retail customers.

52. It is also imperative to acknowledge that Qwest has been successfully unbundling these types of loops, and, in accordance with the Commission's requirements, will continue to do so as the CLEC submits these unique batches for conversion. Exhibits DP-11 and DP-11.1 are the process flow and associated legend that Qwest follows in order to provision UNE-Loops when IDLC is an issue.

A. Batch Size

53. Qwest has established minimum and maximum order volumes on a central office by central office basis. The minimum is a batch size of 25 lines per CLEC and the maximum is a daily central office volume limit of 100 lines total (for all CLECs) per central office. As discussed in greater detail below, the 25 line minimum is necessary to achieve efficiencies from consolidating tasks and spreading costs across cutovers, and the 100 line maximum reflects the work that dedicated, two-central office technician teams can perform in an eight hour shift. Some CLECs at the Forum expressed concern that a single invalid line at order submittal could jeopardize the other lines in the batch and result in the entire batch being rejected. To satisfy this concern, Qwest will process a batch so long as it (a) started with 25 lines or more and (b) still contains 20 lines in it

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once unqualified lines are excluded. This change was sufficient to close the issue to the CLECs' satisfaction at the Forum.

54. At the BHC Forum, several CLECs argued that a hundred-line maximum per central office per day would not be sufficient for them to convert their embedded base of UNE-P customers. This assumption ended up to be incorrect. It would only take approximately 109 business days to transition the office with the greatest number of UNE-P lines in Qwest's 14-state region using maximum daily batches of 100 lines, leaving ample time for a multitude of other conversions to take place in offices where additional migrations have been requested. Now, in light of the commercial arrangements for Qwest Platform Plus (QPP), which does not require a hot cut for conversion from UNE-P, the anticipated conversion activity is far below that which was first forecasted under the original *Triennial Review Order* timeline.

B. Batch Scheduling

55. Requests for conversions pursuant to the BHCP will be conducted Monday through Friday between the hours of 3:00 AM to 11:00 AM, excluding holidays. Due to concerns raised by several CLECs, Qwest has determined that it will use best efforts to complete the lift and lay activity during the first portion of the shift to mitigate service disruptions to the end user and give the CLEC ample opportunity to port the number in the early morning hours – usually before most businesses would open, and when most residential end-users are asleep. Later in the COT's shift, the COT would perform the advance pre-wiring for orders due 4 or 5 days hence. Qwest has tested this process in

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numerous trials with a single CLEC in Idaho, Iowa, Minnesota and Washington. During this test, the pre-wires were performed on Design/Verify/Assign (DVA) while the lift and lay activity was conducted beginning at 3:00 AM on the Due Date. In only one instance was a line in use when the pre-wire or lift and lay process began – and not surprising, it was the same end user in both cases. Confidential Exhibit DP-12 is the report from Hitachi Consulting providing additional detail on each of these batches in addition to detailed time measurements.

56. Qwest's decision to perform the work in these early morning hours was developed with two things in mind – little to no disruption to the end users service and working on frames in an efficient manner with little to no traffic on them. We believe that we accomplished both but met with some discontent from CLECs that wanted to schedule conversions at specific times. Qwest demonstrated that it can not efficiently prioritize central office work and organize COTs' movements through the central office if CLECs are able to demand that certain cutovers be performed at specific times. Such scheduling would interrupt the efficient task flow and reintroduce the need for the QCCC to communicate via telephone with CLECs regarding work start and stop times. Importantly, if a CLEC finds that it needs to schedule a hot cut for a particular customer at a specific time, the CLEC will still have the ability to do so by using the existing coordinated hot cut process. As explained above, Qwest provisions over more than 99% of such coordinated cuts on time today.

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57. While picking times would not lend itself to remaining efficient, choosing days is another story. With the implementation of Appointment Scheduler for batch scheduling, the CLECs will be able to schedule conversions on any normal business day (Monday – Friday) as long as the batch limits in a given CO have not been exceeded. However, the expectation still remains that a transition plan would need to occur between the parties to ensure an orderly conversion schedule. While the CLECs at the first forum generally accepted the need (and the *Triennial Review Order*'s legal requirement) for up-front planning for the transition of the embedded base of UNE-P lines, several CLECs expressed concern with having an up-front coordination step for batched migrations of newly acquired customers and the time frames associated with such a meeting. In response to these comments, Qwest agreed to modify the Appointment Scheduling Tool to enable CLEC to schedule their own batch hot cut days. The tool will allow a CLEC to search for a specific CO and a specific date. The tool will display the number of batch hot cuts that can be performed on that date at the selected CO. If there are slots available, the CLEC may then reserve a number of cuts in that CO for the designated day. If the CLEC enters 25 or more lines for conversion, the Appointment Scheduler functionality will return an appointment confirmation number. In addition, CLECs will be able to "add" lines to an existing batch as long as the standard installation interval is met, and the batch size does not exceed 100 lines.

C. Batch Statusing

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58. This tool will provide BHC status to the CLEC throughout the entire BHCP, not just on the Due Date. The BST will allow each CLEC to review the status of their Batch Hot Cut orders when the orders are processed through the Service Order Processor into the Work Force Administrator (“WFA”). Qwest expects typical orders to appear on the BST approximately 2 days following order submission, and several days before the Due Date. Information provided on the BST will include:

- Due Date
- Customer Identification (ZCID)
- State
- Common Language Location Identifier (CLLI)
- Complete with Related Order (CRO) field
- Circuit Facilities Assignment (CFA) Location
- Circuit Facilities Assignment (CFA) Number
- Job Identifier
- Circuit Layout Order (CLO) number
- Purchase Order Number (PON)
- Order Number
- Telephone Number (TN)
- Order status (Pending, Jeopardy (No Dial Tone, Customer Not Ready, Line in Use, Polarity Reversal), and Completed)
- Completion Date/Time

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- Required Response Date/Time for Completed and Jeopardy orders
- QCCC e-mail address for CLEC messages pertaining to Completed and Jeopardy orders.

59. Qwest will provide the information listed above in a format that allows CLECs to sort the data and to download it into a Microsoft Excel file. An example of the Appointment Scheduler and BST's output is attached in Exhibit DP-13. At the same time, CLECs will continue to receive the same IMA notifications (Firm Order Confirmations ("FOCs"), Service Order Completions ("SOCs"), etc.) for their BHC orders that they currently receive for their requests today. However, IMA completion notifications are not sent until the order is completed within Qwest's service order processor. Qwest created the Batch Status Tool to give CLECs status information faster than they can receive it through IMA.

60. The timely updates into the Batch Status Tool are accomplished by system integration with the Work Force Administration (WFA) which is the same system Qwest CO technicians receive their work assignments from and enter their work completion records into immediately following the lift and lay of the first order in the Batch and then again upon completion of the last order in the Batch (at a minimum, the 25th line). The Batch Status Tool was designed to query WFA for all Batch Hot Cut status changes and will provide updates for the CLEC to review. Once the application queries WFA, the pending, jeopardy and recently completed orders information will immediately post to the

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Batch Status Tool. The Tool will also allow commissions with a means of tracking CLEC conversion progress if State Commission have a desire to do so.

61. While the Status Tool addressed the CLECs' needs, the CLECs to some extent seemed to be at odds with each other. MCI reported that it was pleased with the solution, that a web-based tool would provide CLECs with adequate notice, and that it was not too much work for CLECs to retrieve information from a web-based status tool. AT&T, by contrast, took one aspect of the BST to impasse. AT&T argued that a tool that provides automatic status update information at a web site still required the CLEC to perform too much work to retrieve that information; instead, AT&T wanted Qwest to "push" the information to them (via an e-mail, for example) when an order was in jeopardy status, even though the status tool provides the CLEC with 72 hours to rectify a NDT situation. This position ran counter to AT&T's original comments. Qwest's original plan was to send an e-mail, and AT&T (and many other CLECs) objected to e-mail notification and requested a web-based status tool instead. Once Qwest provided the status tool they had requested, AT&T reversed course and again demanded e-mail notification. The need for such notification has been eliminated with the adoption of the status tool.

D. Batch Ordering

62. During the ordering of a BHC, CLECs will complete an accurate LSR via either EDI or IMA GUI in the same manner they do for a Basic Hot Cut request today. LSRs requesting BHCs must also contain the CHC field populated with a "B" for batch

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and include the confirmation number for the batch and frame due date returned from Appointment Scheduler.

63. The BHCP also includes additional IMA validations such as determining that the CLEC has appropriately populated LSR fields designating the order as a BHC. These validations will take the form of new edits and/or error messages. Business Process Level (“BPL”) edits which will be developed are items to aid the CLEC in making a BHC request. The CHC field must be populated with the correct elements for the request to move forward into the batching of the service order for the CO. Some of the fields which will have the BPL edits established are the REQ TYP – request type AB, BB, or UB, ACT-V (for conversion as specified) or Z (conversion with no directory listing changes), APTCON (this would be populated with the information from the Appointment Scheduler), TEST=N or blank (indicating there are no special testing requirements). DSPTCH=N or blank (indicating no dispatch), CHC=B (indicating the request is for a BHC), NC=LX- - (for loop) or LX-N (loop with loop splitting) (this is the only network channel code allowed in the BHCP). Once an LSR passes these validations, a BHC USOC will be assigned to the Qwest service order. The BHC USOC drives the utilization of the new BHC process and the corresponding new lower NRC for each line associated in the BHC. All CLECs agreed that this process was acceptable.

E. Batch Provisioning Intervals

64. The CLEC must submit an LSR at least seven business days in advance of the time slot available in the scheduling tool. In past 271 proceedings, CLEC and State

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Commissions agreed to a seven business day interval where the CLEC submits order volumes between 17-24 lines for the same customer at the same address. These intervals are memorialized in the Service Interval Guide (“SIG”), which is Exhibit C to the state’s approved SGAT, and which is attached here as Exhibit DP-14. Unlike the current provisioning options for project types of conversions, the BHC seven business day interval allows the CLEC to give their end user a date certain due date without the need to negotiate when volumes are in excess of 24 lines. To my knowledge, this interval is significantly shorter than those offered by any other ILEC for comparable UNE-P migration activity.

F. Batch DVA Activity – Pre-Wiring

65. Qwest had intended to move the pre-wire and DT/ANI steps to the Due Date for efficiency reasons; however, several CLECs at the forum asked that these steps remain on DVA (day 2 or 3 in a 7 business day interval) in order to allow time for both Qwest and the CLEC to respond to any issues that may be encountered with their respective networks. Qwest agreed to modify its new BHCP to keep these work steps on days 2 or 3 with the understanding that Qwest will have discretion to perform pre-wiring and the DT/ANI tests on either day 2 or day 3 in order to gain the efficiencies from balancing the workload over multiple days. Upon concluding these testing steps, Qwest will notify the CLEC via the Batch Status Tool of any No-Dial-Tone (“NDT”) or reverse wiring or bad CFA situations. The NDT notification provides the CLECs with ample time prior to the Due Date to resolve issues. Qwest explained at the forum that moving

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pre-wiring and testing to days 2 and 3 of the process instead of conducting all the work on Due Date, which Qwest originally proposed, would increase the costs associated with the COT activity - the CLECs requested the pre-wiring change anyway.

66. One of the most important steps in the pre-wire process is having dial tone to verify when the pre-wiring is occurring. To this end, the CLECs committed at the Forum to have their switch translations completed by midnight of day 1, and agreed that such a commitment is reasonable.²⁶ If the CLEC receives a jeopardy via the web-based status tool, then the CLEC will have a minimum of 2 days and a maximum of 3 days to issue a subsequent order to change their CFA, perform their translation work or correct any other CLEC related issue that may be causing the problem. Per the PCAT the standard interval for CFA changes is 3 days, therefore the CLEC's subsequent LSR for CFA changes needs to be submitted no later than 7 PM on day 4 of the 7 day interval. For all CLEC changes, other than CFA changes, the CLECs do not need to notify Qwest of their corrective actions. Qwest will assume that corrective action will be taken by DD. It remains the responsibility of the CLEC to ensure that its network (collocation facilities and tie cable pairs between that collocation and its terminations on the ICDF) are working and able to carry dial tone between these points. The verification by the CLECs can occur any time between when the collocation is first established up until the day the conversion orders are due; it is up to the CLEC to make this determination. The CLEC

²⁶ See, e.g., 1/17/04 Tr. at 173:1-13, 22-24 (John Finnegan, AT&T) (noting that AT&T's normal business procedure is to establish switch translations prior to submitting the LSR or mechanically within four hours of receipt of the FOC; hence it "would not be a problem" to have switch translations in place by midnight of day one.

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does not have to (and should not) wait until it receives a NDT notice from Qwest to resolve issues on its side of the network. The CLEC could do this testing by placing testing equipment at its switching location and the same type of equipment on the vertical side of the ICDF to measure end-to-end continuity. Upon conclusion of a successful pre-wire, the CLEC's dial tone should be appearing on a jumper that has been run, via the aforementioned frames, to the COSMIC™ or Main Distribution Frame ("MDF") and looped near its final termination point for the lift and lay activity on the order's due date.

G. Due Date Activity – Lift and Lay

67. On due date, the Qwest COT will test the pre-wired loop, at the COSMIC™ or MDF, for dial tone to ensure that the CLEC has worked their translations and that the CLEC CFA information is correct and working. In addition, Qwest will conduct an ANI test on the Qwest cable and pair (where the existing UNE-P customer resides) to ensure that the correct pair and TN are reflected on the service order. Upon verifying both the CLEC and existing customers' DT, Qwest will monitor the line prior to performing the lift and lay and conduct the work only after finding the line in an idle state. If idle, the lift and lay will remove the end user from the Qwest switching platform and connect them to the CLEC's switching platform. Qwest performs a final DT/ANI test at the protector frame once all of the office wiring is complete to verify that the lift and lay was performed correctly and DT is present at the last point before it leaves the CO. However, if the line is in use, the Qwest COT would recheck the line at a later time (total of three times) and if still in use, remove the line (and any other associated line on the same order)

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from the batch. At this point, the CLEC would be notified via the Batch Status Tool of the line being in use and Qwest's placement of this order in jeopardy status. At this point, it is up to the CLEC to reschedule a new due date for this customer and their lines. The possibility of this occurring is significantly reduced by the time frame in which these cuts are performed – 3:00 a.m. to 11:00 a.m. The CLEC should also take this opportunity to notify their end users of the pending order activity and let them know that they may experience a momentary disruption during the hours of operation that Qwest will convert an embedded base UNE-P order utilizing the BHCP.

68. If dial tone is not present on the due date, the CLEC will be notified and the LSR will be placed in jeopardy status and removed from the batch. It is important to note that if a single LSR contains multiple loops and a single loop does not have dial tone on the Due Date, then all loops in the LSR are placed in a jeopardy status. This is necessary, and the CLECs at the Forum did not object to this point. Upon notification, the CLEC will need to issue a subsequent change to that order and resubmit the LSR for a new Due Date. At the CLEC's option, the LSR can be added to another batch for that office or a different installation option can be chosen. Additionally, the CLEC needs to verify if the LSR was related to any other LSRs. It is the CLECs responsibility to notify Qwest if there are any related LSRs that need to be cut back.

H. Batch and the Cut Back Process

69. The cut back process is the same as the one currently used by the CLECs today with any of the other provisioning options or products. Exhibit DP-15 sets forth

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the cut back process. In essence, this process allows the CLEC to notify Qwest the day of the conversion and request that the CLEC end user be moved back to the Qwest switching platform due to some issue that the CLEC was not able to resolve and was concerned about their end user's ability to receive phone calls or retain DT. Upon receiving notification from the CLEC, the QCCC would notify the CO requesting that the COT move the CLEC end user back to the facilities that they resided on prior to the conversion order being worked. In order to ensure that the cut back can occur without the need to submit a new service request, the CLEC must notify Qwest of the need to cut back end user line within two hours of work completion identified through the Batch Status Tool. The CLEC will email the QCCC with the cut back information. If this request is submitted to Qwest after the 2 hour work completion notification, the CLEC would have to issue a new service request for the service to be reconnected. One of the additional benefits of conducting the BHC work during the early morning hours is that it gives the CLEC ample opportunity to determine if issues exist long before Qwest's translations removal would complete. The frame due time will continue to be 6:00 PM for all conversion orders. The parties agreed that this process was acceptable.

I. Batch and Number Porting

70. One of the most important aspects of any conversion is the notification to the switch staff and the subsequent submittal of the subscription in order to port the number – this step is beyond the control of Qwest and the BHCP. The CLECs have two ways to

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know when the central office work has been completed. First, a CLEC can use existing functionality in its switches to “Trap and Trace” Qwest’s ANI tests on the lines in the batch, thereby receiving instantaneous notification that the cutover of a line is about to begin and when the cutover is complete. Second, Qwest has agreed to implement the Batch Status Tool that will give the CLEC information on order status or status changes and indicate which orders or batches of orders have been completed.

71. Trap and Trace technology is a switch based feature and appears to be a viable option which could provide the CLEC with instant notification that the lift and lay activity has been completed by Qwest. The most common application of this technology is the Last Call Identification feature, “*69”. The CLEC can have its switch “Trap and Trace” a line that is a candidate for a conversion. By implementing “Trap and Trace”, the CLEC will be able to detect the two ANI tests that the Qwest COT performs immediately before and immediately after the lift and lay. The initial ANI test would be an indication that the hot cut of that line is beginning, and the post-cutover test would signal that the lift and lay of that line had been completed. By monitoring its switch, the CLEC’s OSS can effectively receive instantaneous notification when a cut-over is finished and electronically initiate the porting of the telephone number associated with that line, thereby keeping customer outage times to a minimum.

72. This notification solution was discussed late in the BHC Forum and tested by a CLEC as part of the BHC process testing that was conducted. Other CLECs agreed to continue researching it after the Forum’s conclusion and to report back to Qwest prior to

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the filing of testimony. On January 21, 2004, AT&T representative John Finnegan reported by e-mail that AT&T was still considering trap and trace but “believe[s] it had some potential to work,” although AT&T believes it should not be the only notification method available to CLECs.²⁷ Similarly, a McLeod representative reported by e-mail that McLeod “believes this could be a viable option,” although, like AT&T, McLeod believes that additional options should be available as well.²⁸ Trap and Trace was not the only possible solution suggested at the Forum. Qwest’s original proposal involved notifying the CLECs by e-mail periodically throughout the course of the lift and lay process to let them know what conversions had been completed. A number of CLECs expressed concern with an e-mail-based notification process citing latency in their network and having to designate a single e-mail address that will receive such e-mails. Therefore, as previously mentioned, Qwest is developing the Batch Status Tool.

J. Batch Performance

73. Qwest will continue to monitor the BHCP in the same manner that loop conversion activity is monitored today. There are currently PIDs in place that monitor loop installations and Qwest believes that certain aspects of these existing measurements should/will be applicable to the BHCP. In addition, personnel from the QCCC will continue to monitor order misses and conduct analysis to determine reason for miss and address each through further training or modifications to the existing process. Qwest will also take steps to ensure that the dedicated teams of COTs assigned to this effort will

²⁷ E-mail from John F. Finnegan, AT&T, to Carolyn Hammack, Qwest (Jan. 21, 2004).

²⁸ E-mail from Patty C. Lynott, McLeod to Carolyn Hammack, Qwest (Jan. 21, 2004).

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receive and acknowledge proper training on the new process prior to the first BHC being performed. This training will also be conducted within those organizations whose processes are impacted by the changes this joint team has made under the new process.

74. As part of the Section 271 process, Qwest, the CLEC community and the 14-state commissions created a process known as Long Term PID Administration (“LTPA”). The purpose of the LTPA is to create new performance measures or PIDs or to modify existing PIDs as the requirements of the business dictate. Qwest has agreed to expedite the creation of batch hot cut specific PIDs if such PIDs are deemed necessary by the LTPA. If the LTPA decides that creation of the BHCP does not require changes to existing PIDs or creation of new PIDs, there are many existing PIDs that track Qwest’s performance in providing unbundled analog loops to CLECs. As such, analog loops provisioned using the BHCP would be included with the many other provisioning options and would be tracked, from a PID perspective, in some of the following PIDS:

- OP-3: Provisioning Commitments Met on Due Date
- OP-5: New Installation Service Quality (troubles reported within 30-days of installation)
- All Maintenance and Repair measures including, but not limited to, the overall trouble rate (MR-8).

75. Thus, several key components of Qwest’s performance will be tracked under the existing PIDs so that the Commission can monitor Qwest’s overall performance in provisioning analog loops to CLECs.

X. THE HITACHI REPORT

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76. To ensure efficiency, seamlessness and scalability of the new process, Qwest requested assistance from Hitachi Consulting Group in an effort to differentiate between the current Hot Cut process and the newly proposed BHCP and then to make fact based assessments. Hitachi worked with Qwest to verify and validate each step in the new BHCP. Up until the issuance of the Hitachi report, they had participated in each and every trial that Qwest conducted with a CLEC in MN, WA, ID, and IA. Hitachi delves into this in much greater detail in its report – Exhibit DP-12 - but I will provide a high level summary. On numerous occasions, Qwest worked with a CLEC to conduct a test utilizing the BHCP. The first test took place in Minneapolis, MN on December 17th and 18th, 2003 and entailed the conversion of two separate batches of orders on consecutive days utilizing Qwest's original proposed BHCP. As such, pre-wire and lift and lay were both conducted on Due Date and communication was limited to electronic spreadsheets between the companies. The second test was discussed earlier in my testimony and took into consideration some of the changes suggested by the CLECs in attendance during the BHC Forum – principally changing the time for pre-wire from Due Date to DVA. The results of the second test were far superior in terms of provisioning time than the results of the first test. This is probably explained by the fact that, in the second test, the COTs were able to conduct their work with limited interference from outside observers – both Qwest and CLEC. Hitachi Consulting was present at each office where the testing was conducted including central offices in CO, WA, ID, IA and MN to monitor the tasks associated with each of the swim lanes on the process flow. The information witnessed

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during these observations served as the basis for the assessments Hitachi was performing to ensure that the newly proposed BHCP can meet the needs of the CLEC community not only in those markets where a finding of no impairment is entered, but also where CLECs desire to use the new process for its newly acquired customers. The Hitachi work was not limited to the central office either. Hitachi also conducted observation in many of Qwest work centers including the QCCC, Design Services Center, Service Delivery, Loop Provisioning Center, (“LPC”) and Central Office Resource Allocation Center (“CORAC”) with the expectation of observing conversions both under the current Hot Cut process as well as the new BHCP.

77. The results of these observations are contained in Hitachi’s report but, in summary, here is what it concluded. Based on the current volumes being processed through the QCCC, and Hitachi’s observations in the field, Hitachi assessed Qwest’s capabilities of being able to handle any anticipated increase in volumes of unbundled loops that may occur as a result of elimination of unbundled switching as a UNE. Hitachi’s conclusion was that the proposed changes in the process and the systems would allow Qwest to handle the volumes expected. Qwest conducted additional BHCP testing in WA and ID following the release of the Hitachi report, and, while the location and COT experience levels differed, the results were fairly consistent with those observed and documented in the earlier trials.

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XI. QPP IMPROVEMENTS

78. In addition to the robust BHCP that was developed through the batch hot cut forum, Qwest has agreed to other improvements as part of its QPP commercial arrangement with MCI. As described in Mr. Campbell's Declaration, several other CLECs have signed the QPP agreement as well.

79. Any carrier signing a batch hot cut amendment to its ICA receives the following BHC improvements:

- Loops provisioned over IDLC systems can be grouped together by the CLEC in batches not exceeding 40 per day per state, subject to an IDLC premium, in addition to the normal BHC non-recurring charge. The 40 per state are in addition to the 100 per day per central office that Qwest had already committed to migrate during the joint forum sessions.
- The migration of line splitting loops to loop splitting in those instances where the data provider, splitter equipment and terminations remain the same. These migrations will count toward the BHC central office limits noted in earlier testimony.

80. Any carrier signing the QPP agreement receives the following additional improvements:

- Substantial reductions in batch hot cut rates in most states.²⁹
- IDLC batches subject to a lower IDLC premium applied to each and every loop migrated under the BHCP.
- The migration of line splitting loops to loop splitting in those instances where the data provider, splitter equipment and terminations remain the same. These migrations will count toward the BHC central office limits noted in earlier testimony.

²⁹ See Campbell Declaration ¶ 12.

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XII. CONCLUSION

81. The joint discussions and eventual introduction of the Qwest BHCP address each and every concern contemplated by the FCC in their *Triennial Review Order*. Qwest developed the BHCP jointly with a wide variety of CLECs during the BHC Forum and while those sessions concluded with some outstanding issues, the framework of the BHCP was established – it has been tested in a commercial environment and has met the expected central office demand at the daily maximum volumes. The OSS modifications being made to supplement the BHCP will only add to the efficiencies and will result in a more mechanized process for order scheduling and notification. Finally, CLECs signing the BHC amendment and/or QPP commercial agreement enjoy additional improvements to the BHCP. This process should eliminate any concern that the need for batch hot cuts represents impairs CLECs from entering a market in the absence of unbundled mass market switching.

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Exhibits List for Batch Hot Cut Testimony

| | | |
|-----------------|-----------------------------------------------|--------|
| Exhibit DP-1 | CD of the Hot Cut and BHCP | Pg. 11 |
| Exhibit DP-2 | Script of the Hot Cut and BHCP | Pg. 11 |
| Exhibit DP-3 | Qwest's Provisioning Options | Pg. 11 |
| Exhibit DP-4 | QCCC Warranty Process | Pg. 14 |
| Exhibit DP-5 | Regional PID Results-Commitments Met | Pg. 18 |
| Exhibit DP-6 | BHC Process Flow | Pg. 29 |
| Exhibit DP-7 | BHC 7 Day Interval | Pg. 29 |
| Exhibit DP-8 | Raw Loop Data Tool Job Aid | Pg. 33 |
| Exhibit DP-9 | CLEC Access to Qwest's RLDT | Pg. 33 |
| Exhibit DP-10 | Confidential – Manual Look-Up Requests | Pg. 35 |
| Exhibit DP-11 | IDLC Process Flow | Pg. 35 |
| Exhibit DP-11.1 | IDLC Decision Tree | Pg. 35 |
| Exhibit DP-12 | Hitachi Report | Pg. 37 |
| Exhibit DP-13 | Batch Status Tool Example | Pg. 40 |
| Exhibit DP14 | Service Interval Guide | Pg. 43 |
| Exhibit DP-15 | Qwest's Cut Back Process | Pg. 47 |

I hereby certify, under penalty of perjury, that the foregoing is true to the best of my knowledge, information, and belief.

Executed on October 1, 2004

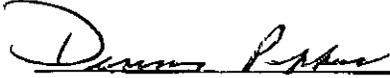

Dennis Pappas

EXHIBIT DP-1

EXHIBIT DP-2

The Hot Cut Process allows telecommunications customers to be converted from one provider to another. The actual hot cut is performed when a customer is not using the circuit and therefore, will not noticeably impact their service. To complete this conversion, it requires that the customer's line be physically switched from the original provider's circuit to the new provider's circuit. The conversion, performed by a technician within the central office, is referred to as a "Hot Cut."

Currently this process is performed one order at a time.

A proposed new process referred to as the Batch Hot Cut Process will allow the work steps for multiple orders to be handled concurrently by two technicians working in tandem.

The following video will demonstrate both the current hot cut process and the proposed Batch Hot Cut Process and will not only follow the various tasks performed while making a hot cut, but will also demonstrate that the batch hot cut process is faster and more efficient than current procedures.

The "Hot Cut" consists of four basic parts: Receiving the Service Order, circuit pre-wiring and testing, the actual Hot Cut and re-testing, and lastly the updating of software and records to reflect the transfer.

The proposed Batch Hot Cut Process will provide additional efficiency by allowing C-LECs to submit multiple loop service orders which Qwest will combine on a single spread sheet for internal use to assist the central office technicians to prioritize by the cross connection location on the InterConnection Distribution Frame and COSMIC or Main Distribution Frame, per C-LEC so that the technicians can perform multiple functionality in each working location more efficiently.

Phone calls traverse a Central Office a facility where subscribers' telephone lines are joined to switching equipment for the connection of local and long distance calls.

Within the Central Office are distribution frames, which are termination points for wiring on one side of the protector frame connecting thousands of wires from the outside world; on the other side are the wires coming from the Central Office switch itself. Both sides are connected with a "jumper" wire that completes the circuit which is the physical connection or path between two given points through which an electric current may be established, and is required for a customer to receive telephone service.